

MMS

**NATIONAL
OFFICE
POTENTIAL INCIDENT
OF
NONCOMPLIANCE (PINC)
LIST**



PREFACE

The Safety and Enforcement Branch of the Engineering and Operations Division wish to extend our appreciation to all participating MMS personnel for their dedicated effort and expertise in developing this edition of the National Office PINC List.

Revisions to the National Office PINC List

The following format is presented as a means for MMS personnel to suggest revisions to the National Office PINC List. All suggested revisions will be reviewed by the Office PINC Team. Before revisions are included in the National Office PINC List they will be routed to the Headquarters Division Chiefs and the Regional Directors, or their staff, for review and comment. Please submit suggested revisions directly to:

Minerals Management Service
Office PINC Team
Safety and Enforcement Branch
Mail Stop 4023
381 Elden Street
Herndon, Virginia 20170

Suggested Revision Format:

PINC Number:
PINC Statement:
Authority:
Enforcement Action:
Rationale/Note:
Definition:
Inspection Procedure:
If Noncompliance Exists:

Please be advised:

The guidelines in this document are to be considered the most preferable way of implementing the inspection and enforcement of each Office PINC and not intended as a directive or to supersede the regulatory language of the Code of Federal Regulations.

Also, the enforcement status of a Facility Shut-in (S) INC or a Component Shut-in (C) INC may not necessarily require the full extent of the enforcement specified. The issuing office has full authority to use their discretion when issuing a Component Shut-in (C) INC. However, when issuing a Facility Shut-in INC the issuing office must solicit approval from the Associate Director for Offshore Minerals Management prior to the actual shut-in of a facility. The only exception to this requirement is when there is an imminent danger to personnel, property, or the environment, exacting a more immediate MMS response.

DESCRIPTION OF THE GUIDELINES FOR THE NATIONAL OFFICE PINC LIST

The guidelines for the Office PINC List establish the procedures MMS office personnel use to identify incidents of noncompliance with MMS regulations found during reviews in MMS offices and to notify Lessees of these incidents of noncompliance. The intent of these guidelines is to ensure that MMS regulations are imposed fairly and consistently for OCS operations. The information provided in the National Office PINC List is shown in the following format:

PINC NUMBER: A unique identifier for the specific requirement.

PINC STATEMENT: The clear and concise description of the requirement.

AUTHORITY: The regulatory authority as found in the Code of Federal Regulations.

ENFORCEMENT ACTION: The action to be taken by the MMS for an identified violation. These actions are a complete facility shut-in (S), a component shut-in (C), or a warning (W). When more than one enforcement is listed, the criteria for each enforcement action is provided in the "IF NONCOMPLIANCE EXISTS" block.

RATIONALE/NOTE: If needed, additional information describing the basis or providing background information pertinent to the requirement stated in the "PINC Statement" block.

DEFINITION: If needed, definitions of terms used in the PINC.

INSPECTION PROCEDURE: Preferred detailed guidelines to be used by the MMS office personnel to ensure that the stated requirement is met. **However, the guidelines in this document are to be considered the preferable method of implementing the enforcement of each PINC and not intended as a directive or to supersede the regulatory language in the Code of Federal Regulations.**

IF NONCOMPLIANCE EXISTS: Describes the specific enforcement action to be taken when a violation of the regulations is determined. An incident of noncompliance (INC) must be issued to document any negative (no) answer to a PINC statement. The number of INC's to be issued for each violation is indicated.

Should an immediate shut-in increase the risk to safety or pollution, a statement on the INC shall indicate when the shut-in is to take effect. In an after-the-fact situation where no correction is possible, a warning (W) INC is issued, since a shut-in would serve no useful purpose.

ACRONYMS USED

Enforcement Actions

W - Warning
C - Component Shut-in
S - Facility (Platform/Rig/Operation) Shut-in

Other Acronyms:

APD - Application for Permit to Drill (form MMS-123)
API - American Petroleum Institute
APM - Application for Permit to Modify (form MMS-124)
CFR - Code of Federal Regulations
DOCD - Development Operations Coordination Document
DOI - Department of the Interior
EOR - End of Operations Report
G&G - Geological and Geophysical
INC - Incident of Noncompliance
MAOP - Maximum Allowable Operating Pressure
MMS - Minerals Management Service
MODU - Mobile Offshore Drilling Unit
MPMS - Manual of Petroleum Standards
MPR - Maximum Production Rate
OCS - Outer Continental Shelf
PINC - Potential Incident of Noncompliance
POE - Plan of Exploration
ROW - Right-of-Way
SAC - Safety Analysis Checklist
SAFE - Safety Analysis Function Evaluation
TIMS - Technical Information Management System
TVD - True Vertical Depth

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G-803

ARE OPERATIONS CONDUCTED IN ACCORDANCE WITH APPROVED PLANS?

Authority: 30 CFR 250.200
30 CFR 254.2

Enforcement Action: W/C/S

INSPECTION PROCEDURE:

Verify that operations are being conducted in accordance with the approved plans, e.g., POE's, DPP's, DOCD's, Oil Spill Response Plans.

IF NONCOMPLIANCE EXISTS:

Issue one warning (W) INC for an audit of one or more operations if the violation(s) of the plan poses no immediate danger to personnel, equipment, or the environment.

Issue one component shut-in (C) INC for an audit of one or more operations if the violation(s) of the plan poses an immediate danger to personnel, equipment, or the environment and the operation(s) can be shut-in without affecting the overall safety of the facility.

Issue one facility shut-in (S) INC if a violation of the plan poses an immediate danger to the entire facility, personnel, or the environment and the operation(s) cannot be shut-in without affecting the overall safety of the facility.

RECORDS

(Last update - January 2004)

G-811

IS REQUIRED PAPERWORK SUBMITTED WITHIN THE TIME FRAME SPECIFIED BY REGULATIONS?

Authority: 30 CFR 250.411

Enforcement Action: W/C

30 CFR 250.465

30 CFR 250.468

30 CFR 250.513(a)

30 CFR 250.613(a)

30 CFR 250.613(d)

30 CFR 250.703(c)

30 CFR 250.1008

30 CFR 250.1202(c)(4)

30 CFR 250.1202(d)(5)

30 CFR 250.1202(f)(2)

30 CFR 250.1203(b)(8)

INSPECTION PROCEDURE:

Verify paperwork has been submitted in the time frame required, i.e., APM, drilling reports, EOR, etc.

IF NONCOMPLIANCE EXISTS:

Issue one warning (W) INC for an audit of one or more activities or operations on a facility if paperwork has not been submitted within the required time frame and activity or operation is not currently being conducted.

Issue one component shut-in (C) INC for an audit of one or more activities or operations on a facility if the activity or operation is being conducted at the time of the review.

PLATFORMS & STRUCTURES

(Last update - January 2004)

G-821 **HAVE THE PLATFORMS AND STRUCTURES BEEN DESIGNED, FABRICATED, INSTALLED, USED, INSPECTED, AND MAINTAINED TO ENSURE ITS STRUCTURAL INTEGRITY FOR SAFE CONDUCT OF DRILLING, WORKOVER, AND PRODUCTION OPERATIONS?**

Authority: 30 CFR 250.900(a)
30 CFR 250.900(b)

Enforcement Action: W

Note: Use this PINC where no other PINC for platforms and structures applies.

INSPECTION PROCEDURE:

Verify that the platforms and structures have been designed, fabricated, installed, used, inspected, and maintained to ensure their structural integrity for safe conduct of drilling, workover, and production operations.

IF NONCOMPLIANCE EXISTS:

Issue one warning (W) INC for an audit of a facility if the platforms and structures have not been designed, fabricated, installed, used, inspected, and maintained to ensure their structural integrity.

G-822 **HAS THE OPERATOR PERFORMED THE REQUIRED STRUCTURAL SURVEYS FOR THE PLATFORM AND SUBMITTED A REPORT OF THE RESULTS ANNUALLY BY NOVEMBER 1 TO THE REGIONAL SUPERVISOR?**

Authority: 30 CFR 250.900(a)
30 CFR 250.900(b)
30 CFR 250.912

Enforcement Action: W

INSPECTION PROCEDURE:

Review records in TIMS and documentation submitted by operator and others to determine if the platform is in compliance with the structural survey inspection and reporting requirements.

IF NONCOMPLIANCE EXISTS:

Issue one warning (W) INC for a records audit of a facility if records indicate that the existing platform was not in compliance with the structural survey inspection and reporting requirements. *(New Office PINC proposed by Office of Structural & Technical Support.)*

G-823 **DOES THE LESSEE COMPILE, RETAIN, AND MAKE AVAILABLE PLATFORM STRUCTURAL RECORDS FOR THE LIFE OF THE PLATFORM, INCLUDING THE RESULTS OF PLATFORM STRUCTURAL INSPECTIONS?**

Authority: 30 CFR 250.912
30 CFR 250.914

Enforcement Action: W

INSPECTION PROCEDURE:

1. Review operator records to verify that the records for each platform are available.
2. Verify that the lessee maintains for the functional life of the platform the following records:
 - A. The as-built structural drawings.
 - B. The design assumptions and analyses.
 - C. A summary of the nondestructive examination records.
 - D. The inspection results from platform inspections.
3. Verify that the records for each inspection include:
 - A. The type of inspection employed (e.g., visual, magnetic particle, or ultrasonic testing).
 - B. A summary of the testing results.
 - C. What repairs, if any, were needed.
 - D. What repairs were made.
 - E. The overall structural condition of the platform.
4. Verify that the platform has been inspected at intervals required by MMS.

IF NONCOMPLIANCE EXISTS:

Issue one warning (W) INC for an audit of a facility if operator records:

1. Are not available.
 2. Do not contain all of the required information.
 3. Do not indicate that the inspections were performed at the required frequency.
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G-854	<p>IS WELL-CONTROL AND PRODUCTION SAFETY TRAINING FOR EMPLOYEES PROVIDED FROM SOURCES THAT MEET THE REQUIREMENTS OF THE TRAINING PLAN?</p> <p>Authority: 30 CFR 250.1503(a) 30 CFR 250.1505</p> <p>Enforcement Action: W</p> <p>INSPECTION PROCEDURE: Verify that training for employees is from sources that meet the requirements of the training plan.</p> <p>IF NONCOMPLIANCE EXISTS: Issue one warning (W) INC for an audit of a lessee's training program if training for employees is not provided from sources that meet the requirements of the training plan.</p>
G-855	<p>IS PERIODIC TRAINING PROVIDED TO ENSURE THAT EMPLOYEES MAINTAIN UNDERSTANDING OF, AND COMPETENCY IN, WELL-CONTROL OR PRODUCTION SAFETY PRACTICES?</p> <p>Authority: 30 CFR 250.1506(a)</p> <p>Enforcement Action: W/C</p> <p>INSPECTION PROCEDURE:</p> <ol style="list-style-type: none"> 1. Verify that the training plan provides for periodic training to ensure that employees maintain understanding of, and competency in, well-control or production safety practices. 2. Verify that periodic training is provided to ensure that employees maintain understanding of, and competency in, well-control or production safety practices. <p>IF NONCOMPLIANCE EXISTS: Issue one warning (W) INC for an audit of a lessee's training program if the training plan does not provide for periodic training to ensure that employees maintain understanding of, and competency in, well-control or production safety practices. Issue one component shut-in (C) INC for each employee that is not provided periodic training to ensure that the employee maintains understanding of, and competency in, well-control or production safety practices. Note: The employee is the component.</p>
G-856	<p>DOES EACH EMPLOYEE UNDERSTAND AND PERFORM THE ASSIGNED WELL-CONTROL OR PRODUCTION SAFETY DUTIES?</p> <p>Authority: 30 CFR 250.1503(a)</p> <p>Enforcement Action: W/C</p> <p>INSPECTION PROCEDURE: Verify that lessee's training plan provides a process to ensure that employees understand and can perform their assigned well-control or production safety duties.</p> <p>IF NONCOMPLIANCE EXISTS: Issue one warning (W) INC for an audit of one or more employees if the training plan fails to provide a process to ensure that employees understand and can perform assigned well-control or production safety duties. Issue one component shut-in (C) INC for one or more employees that do not understand or cannot perform the assigned well-control or production safety duties. Note: The employee is the component.</p>
G-857	<p>DOES THE LESSEE ALLOW MMS OR ITS AUTHORIZED REPRESENTATIVE TO ADMINISTER WRITTEN OR ORAL WELL-CONTROL OR PRODUCTION SAFETY TESTS AT THE WORK SITE OR ONSHORE LOCATION?</p> <p>Authority: 30 CFR 250.1507(c) 30 CFR 250.1508(a)</p> <p>Enforcement Action: W</p> <p>INSPECTION PROCEDURE: Verify that MMS or its authorized representative is allowed to administer written or oral tests at the lessee's work site or onshore location.</p> <p>IF NONCOMPLIANCE EXISTS: Issue one warning (W) INC for an audit of a lessee's training program if MMS or its authorized representative is not allowed to administer written or oral tests at the lessee's work site or onshore location.</p>

ENVIRONMENTAL PROTECTION

(Last update - January 2004)

OIL SPILL RESPONSE PLANS

(Last update - January 2004)

E-801

HAS AN OIL SPILL RESPONSE PLAN BEEN APPROVED BY OR HAS A CERTIFICATION OF CAPABILITY TO RESPOND BEEN SUBMITTED TO THE REGIONAL SUPERVISOR FOR A FACILITY PRIOR TO OPERATING THAT FACILITY?

Authority: 30 CFR 254.2

Enforcement Action: W

INSPECTION PROCEDURE:

Verify that an Oil Spill Response Plan has been approved or a certification of capability to respond has been submitted to the Regional Supervisor prior to operating the specified facility.

IF NONCOMPLIANCE EXISTS:

Issue one warning (W) INC for an audit of any facility if an Oil Spill Response Plan has not been approved or a complete certification of capability to respond has not been submitted to cover that facility prior to operating the facility.

E-802

HAS EACH OIL SPILL RESPONSE PLAN BEEN REVIEWED AND HAVE THE RESULTING MODIFICATIONS BEEN SUBMITTED TO THE REGIONAL SUPERVISOR FOR APPROVAL WHEN REVISIONS ARE MADE TO THE PLAN?

Authority: 30 CFR 254.30(a)

Enforcement Action: W

30 CFR 254.30(b)

INSPECTION PROCEDURE:

1. Verify that the lessee or operator has reviewed each of his Oil Spill Response Plans at least every 2 years for adequacy to meet current conditions.
2. Verify that the lessee or operator has informed the Regional Supervisor that there are no changes to an Oil Spill Response Plan as a result of each review.
3. Verify that revisions to an Oil Spill Response Plan are submitted within 15 days to the Regional Supervisor for approval whenever:
 - A. A change occurs which significantly reduces the response capabilities.
 - B. A significant change occurs in the worst case discharge scenario or in the type of oil being handled, stored, or transported at the facility.
 - C. A change in the name(s) or capabilities of the oil spill removal organization cited in the plan.
 - D. A significant change is made to the Area Contingency Plan(s).

IF NONCOMPLIANCE EXISTS:

Issue one warning (W) INC for each audit of each Oil Spill Response Plan if:

1. The Oil Spill response Plan has not been reviewed for adequacy at least every 2 years.
 2. The Regional Supervisor has not been notified of the results of each Oil Spill Response Plan review.
 3. Revisions to each Oil Spill Response Plan have not been submitted for approval to the Regional Supervisor within 15 days of making the revision.
-

E-811

HAS THE OWNER(S) OR OPERATOR(S) OF AN OFFSHORE FACILITY LOCATED IN STATE WATERS SEAWARD OF THE COAST LINE SUBMITTED AN OIL SPILL RESPONSE PLAN, PREPARED IN ACCORDANCE WITH ONE OF THE APPROVED METHODS, TO THE REGIONAL SUPERVISOR FOR APPROVAL?

**Authority: 30 CFR 254.50
30 CFR 254.51
30 CFR 254.52
30 CFR 254.53**

Enforcement Action: W

INSPECTION PROCEDURE:

1. Verify that an oil spill response plan was submitted to the Regional Supervisor for approval.
2. Verify that the oil spill response plan was prepared in accordance with one of the approved methods.
3. Verify that the oil spill response plan contains the required information.

IF NONCOMPLIANCE EXISTS:

Issue one warning (W) INC for each required oil spill response plan audited if:

1. An oil spill response plan was not submitted to the Regional Supervisor for approval.
 2. The submitted oil spill response plan was not prepared in accordance with one of the approved methods.
 3. The submitted oil spill response plan does not contain the required information.
-

E-812

HAS THE OWNER(S) OR OPERATOR(S) OF OFFSHORE FACILITIES LOCATED IN STATE WATERS SEAWARD OF THE COAST LINE SUBMITTED REQUIRED ADDITIONAL OIL SPILL PREVENTION INFORMATION TO THE REGIONAL SUPERVISOR?

Authority: 30 CFR 254.54

Enforcement Action: W

INSPECTION PROCEDURE:

Verify that, in addition to the oil spill response plan, the following information was submitted to the Regional Supervisor:

1. A description of the steps being taken to prevent spills of oil or mitigate a substantial threat of such a discharge.
2. Identification of all State or Federal safety or pollution prevention requirements that apply to the prevention of oil spills the facility, and a demonstration of compliance with these requirements.
3. A description of industry safety and pollution prevention standards the facility meets.
4. A description of how any additional equipment or procedures prescribed by the Regional Supervisor are incorporated.

IF NONCOMPLIANCE EXISTS:

Issue one warning (W) INC for each set of submitted additional oil spill prevention information audited if:

1. The required additional information has not been submitted with the oil spill response plan.
 2. The additional information submitted is incomplete or inadequate.
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TRAINING
(Last update - January 2004)

E-821

ARE THE REQUIRED OIL SPILL RESPONSE TRAINING RECORDS FOR THE SPILL-RESPONSE OPERATING TEAM AND THE SPILL-RESPONSE MANAGEMENT TEAM AVAILABLE FOR REVIEW UPON REQUEST BY THE AUTHORIZED MMS REPRESENTATIVES, AND ARE THE RECORDS KEPT FOR AT LEAST 2 YEARS?

Authority: 30 CFR 254.41

Enforcement Action: W

DEFINITION:

Records – Training certificates and training attendance records issued by the organization(s) providing the training.

INSPECTION PROCEDURE:

1. Review the current approved Oil Spill Response Plan to identify members of the Spill-response Operating Team and Spill-response Management Team, including the spill-response coordinator and alternates.
2. Review the current approved Oil Spill Response Plan to identify the location of the oil spill response training records.
3. Verify that the oil spill response training records are available for review and are kept for at least 2 years.
4. Verify that the records show that:
 - A. Hands-on training, including deployment and operation of the response equipment to be used, of the Spill-response Operating Team was attended at least annually.
 - B. Those personnel responsible for supervising the Spill-response Operating Team have been trained in directing the deployment and use of the response equipment at least annually.
 - C. The annual training of the Spill-response Management Team, including the spill-response coordinator and alternates, include instructions on:
 - (1) Locations, intended use, deployment strategies, and the operational and logistical requirements of response equipment.
 - (2) Spill reporting procedures.
 - (3) Oil-spill trajectory analysis and predicting spill movement.
 - (4) Any other responsibilities the spill management team may have.

IF NONCOMPLIANCE EXISTS:

Issue one warning (W) INC for each audit of the oil spill response training records if the records:

1. Are not available for review.
 2. Are not kept for at least 2 years.
 3. Do not show that all Spill-response Operating Team and Spill-response Management Team members received the required training.
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EXERCISES
(Last update - January 2004)

E-831

HAS THE REGIONAL SUPERVISOR BEEN NOTIFIED OF THE DATE OF ANY OIL SPILL RESPONSE PLAN EXERCISE FOR AT LEAST 30 DAYS BEFORE THE EXERCISE?

Authority: 30 CFR 254.42(f)

Enforcement Action: W

INSPECTION PROCEDURE:

Verify that the Regional Supervisor has been notified of the following exercises at least 30 days before they are conducted:

1. Annual spill management team tabletop exercise;
2. Annual deployment exercise of response equipment identified in the plan and that is staged at onshore locations; and
3. Semiannual deployment exercise of any response equipment which the Regional Supervisor requires an owner or operator to maintain at the facility or on dedicated vessels.

IF NONCOMPLIANCE EXISTS:

Issue one warning (W) INC for each exercise if the Regional Supervisor was not notified of the exercise within the required time frame.

E-832

ARE EXERCISES FOR ALL PARTS OF EACH OIL SPILL RESPONSE PLAN CONDUCTED AT LEAST ONCE EVERY 3 YEARS?

Authority: 30 CFR 254.42(a)

Enforcement Action: W

30 CFR 254.42(b)

30 CFR 254.42(c)

30 CFR 254.42(d)

INSPECTION PROCEDURE:

Verify that exercises of the entire Oil Spill Response Plan, including response personnel and equipment, is exercised at least once every 3 years.

Note: Individual parts of the Oil Spill Response Plan may be exercised separately over the 3-year period.

IF NONCOMPLIANCE EXISTS:

Issue one warning (W) INC for an audit of an Oil Spill Response Plan if records do not indicate that all parts of the Plan were not exercised at least once every 3 years.

E-833

ARE EXERCISES OF SPECIFIED PORTIONS OF THE OIL SPILL RESPONSE PLAN EXERCISED MORE FREQUENTLY THAN ONCE EVERY 3 YEARS?

Authority: 30 CFR 254.42(b)

Enforcement Action: W

INSPECTION PROCEDURE:

Review the pollution control equipment drill records to verify that:

1. A spill management team tabletop exercise was conducted in the last 12 months.
2. A deployment exercise of the response equipment identified in the oil spill response plan was conducted in the last 12 months.
3. A notification exercise for each facility that is manned on a 24-hour basis was conducted in the last 12 months.
4. A deployment exercise of any response equipment which the Regional Supervisor requires an owner or operator to maintain at the facility or on dedicated vessels was conducted in the last 6 months.

IF NONCOMPLIANCE EXISTS:

Issue one warning (W) INC for each audit of the oil spill response plan if:

1. The exercises are not conducted within the required time period.
 2. The exercises did not incorporate the proper tests.
 3. The spill scenario was revealed prior to the start of any exercise.
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OIL SPILL REPORTS
(Last update - January 2004)

E-841

HAS THE LESSEE OR OPERATOR REPORTED EACH OIL SPILL OBSERVED FROM OCS FACILITIES?

Authority: 30 CFR 250.46

Enforcement Action: W

INSPECTION PROCEDURE:

1. Verify that the lessee or operator immediately notified the National Response Center if an oil spill is observed:
 - A. From the lessee's or operator's facility.
 - B. From another offshore facility.
 - C. Of unknown origin.
2. Verify that the lessee or operator notified the Regional Supervisor orally without delay, with a written follow-up report, if an oil spill estimated to be one barrel or more from the lessee's or operator's facility is observed.
3. Verify that the lessee or operator immediately notified the Regional Supervisor and responsible party if an oil spill from another offshore facility is observed

IF NONCOMPLIANCE EXISTS:

Issue one warning (**W**) INC for each oil spill audit if:

1. Records indicate that an oil spill was observed and not reported within the specified time period.
 2. A written follow-up report for an oil spill of one barrel or more from the lessee's or operator's facility was not received by the Regional Supervisor within 15 days after the spillage has been stopped.
 3. The written report to the Regional Supervisor for any oil spill of 50 barrels or more does not include information on the sea state, meteorological conditions, the size and appearance of the oil slick, and any additional information required by the Regional Supervisor if it is determined that an analysis of the oil spill response is necessary.
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WELL-COMPLETIONS
(Last update - January 2004)

C-801

HAS THE LESSEE RECEIVED WRITTEN APPROVAL FROM THE DISTRICT SUPERVISOR PRIOR TO CONDUCTING WELL-COMPLETION OPERATIONS?

**Authority: 30 CFR 250.505
30 CFR 250.513(a)**

Enforcement Action: C

INSPECTION PROCEDURE:

Verify from office records that prior written approval was received from the District Supervisor.

IF NONCOMPLIANCE EXISTS:

Issue one component shut-in (C) INC for an audit of a well-completion operation if the operator does not have written approval to conduct well-completion operations.

Note: The well is the component.

WELL-WORKOVERS
(Last update - January 2004)

W-801

HAS THE LESSEE RECEIVED WRITTEN APPROVAL FROM THE DISTRICT SUPERVISOR PRIOR TO CONDUCTING NON-ROUTINE WELL-WORKOVER OPERATIONS?

Authority 30 CFR 250.601
30 CFR 250.605
30 CFR 250.613(a)

Enforcement Action: C

INSPECTION PROCEDURE:

Verify from office records that prior written approval was received from the District Supervisor.

IF NONCOMPLIANCE EXISTS:

Issue one component shut-in (C) INC for an audit of a well-workover operation if the operator does not have written approval to conduct non-routine well-workover operations.

Note: The well is the component.

DECOMMISSIONING
(Last update - January 2004)

A-801

IS ISOLATION OF ZONES IN OPEN HOLE ACHIEVED?

Authority: 30 CFR 250.1715(a)(1)

Enforcement Action: W

INSPECTION PROCEDURE:

Verify that cement plugs were placed to extend from a minimum of 100 feet below the bottom to 100 feet above the top of any oil, gas, or freshwater zones.

IF NONCOMPLIANCE EXISTS:

Issue one warning (W) INC for an audit of well plugging operations if the cement plugs were not placed as required.

PRODUCTION
(Last update - January 2004)

P-801

HAS APPROVAL BEEN RECEIVED WHEN THE OPERATOR HAS FLARED OR VENTED OIL-WELL GAS IN EXCESS OF 48 CONTINUOUS HOURS OR 144 CUMULATIVE HOURS DURING ANY MONTH?

Authority: 30 CFR 250.1105(a)(2)(i)

Enforcement Action: W/C

30 CFR 250.1105(a)(2)(ii)

INSPECTION PROCEDURE:

Review flaring or venting records to determine if continuous flaring or venting of oil-well gas has exceeded 48 hours of cumulative flaring or venting of oil well gas has exceeded 144 hours during any month without prior approval of the Regional Supervisor.

IF NONCOMPLIANCE EXISTS:

Issue one warning (W) INC for an audit of flaring or venting operations if flaring or venting has ceased but records indicate that 48 continuous hours or the 144 cumulative hours have been exceeded during a month without approval.

Issue one component shut-in (C) INC for one or more affected wells if flaring or venting is ongoing and records indicate that, in the current month, 48 continuous hours or the 144 cumulative hours have been exceeded without approval.

Note: The affected well is the component.

L-804

IS THE PIPELINE PROPERLY MAINTAINED AND USED FOR THE PURPOSE FOR WHICH THE ROW WAS GRANTED?

Authority: 30 CFR 250.1009(e)

Enforcement Action: W/C

Note: Temporary cessation or suspension of pipeline operations shall not cause the ROW grant to expire.

INSPECTION PROCEDURE:

Review office file records, TIMS data, and any pertinent information received to determine if the pipeline is:

1. In operation;
2. Properly maintained; and
3. Used for the purpose for which the ROW was granted.

IF NONCOMPLIANCE EXISTS:

Issue one warning (W) INC for a pipeline audit if the pipeline is not used for the purpose for which the ROW was granted.

Issue one component shut-in (C) INC for a pipeline audit if the pipeline is not adequately maintained and poses an immediate danger to personnel, the environment, or a facility.

Note: The pipeline is the component.

TESTING

(Last update - January 2004)

L-811

HAS THE REGIONAL SUPERVISOR BEEN NOTIFIED PRIOR TO A PRESSURE TEST ON A PIPELINE?

Authority: 30 CFR 250.1008(a)

Enforcement Action: W/C

INSPECTION PROCEDURE:

Verify that the lessee or the ROW holder has notified the Regional Supervisor prior to conducting a pressure test on a pipeline.

IF NONCOMPLIANCE EXISTS:

Issue one warning (W) INC for a pipeline audit if the lessee or the ROW holder did not notified the Regional Supervisor at least 48 hours prior to conducting a pressure test on a pipeline.

Issue one component shut-in (C) INC for a pipeline audit if a pressure test on the pipeline is currently being conducted and the lessee or the ROW holder has not notified the Regional Supervisor prior to commencing the operation.

Note: The pipeline is the component.

L-812

HAVE THE RESULTS AND CONCLUSIONS OF MEASUREMENTS OF PIPE-TO-ELECTROLYTE POTENTIAL MEASUREMENTS TAKEN ANNUALLY ON EACH DOI PIPELINE BEEN SUBMITTED TO THE REGIONAL SUPERVISOR?

Authority: 30 CFR 250.1000(e)(1)

Enforcement Action: C

30 CFR 250.1005(b)

30 CFR 250.1008(h)

INSPECTION PROCEDURE:

Verify that the results and conclusions of measurements of pipe-to-electrolyte potential measurements taken annually on each DOI pipeline were submitted to the Regional Supervisor before March of each year.

IF NONCOMPLIANCE EXISTS:

Issue one component shut-in (C) INC for a pipeline audit if:

1. Results and conclusions of measurements of pipe-to-electrolyte potential measurements taken annually are not reported to the Regional Supervisor before March of each year.
2. Measurements of pipe-to-electrolyte potential measurements are not taken annually on a DOI pipeline.
3. Measurements of pipe-to-electrolyte potential measurements taken annually on a DOI pipeline are not analyzed.
4. After a review of the report, the Regional Supervisor cannot determine that continued activity would not threaten or result in serious, irreparable, or immediate harm or damage to life (including fish or other aquatic life), property, mineral deposits, or the marine, coastal, or human environment.

Note: The pipeline is the component.

L-813

HAVE PIPELINES THAT WERE INSTALLED, RELOCATED, UPRATED, OR REACTIVATED AFTER BEING OUT OF SERVICE FOR MORE THAN 1 YEAR, BEEN HYDROSTATICALLY TESTED WITH WATER TO A STABILIZED PRESSURE OF AT LEAST 1.25 TIMES THE MAOP FOR AT LEAST 8 HOURS?

**Authority: 30 CFR 250.1003(b)(1)
30 CFR 250.1003(b)(3)**

Enforcement Action: W/C

INSPECTION PROCEDURE:

1. Review the construction report to determine if a hydrostatic pressure test was performed on the pipeline for 8 hours and if the appropriate instruments (i.e., dead weight gauge, temperature recorder, and pressure recorder) were utilized.
2. Check dead weight test readings, temperature chart, and pressure chart.

IF NONCOMPLIANCE EXISTS:

Issue one warning (W) INC for a pipeline construction report audit if:

1. Any of the appropriate instruments were not utilized.
2. Collected data is not available.

Issue one component shut-in (C) INC for a pipeline construction audit if the pipeline was not tested for the required pressure and time period.

Note: The pipeline is the component.

OUT-OF-SERVICE REPORTING

(Last update - January 2004)

L-821

HAS THE LESSEE OR THE ROW HOLDER REPORTED A PIPELINE TAKEN OUT OF SERVICE TO THE REGIONAL SUPERVISOR?

Authority: 30 CFR 250.1008(c)

Enforcement Action: W

INSPECTION PROCEDURE:

1. Verify that the lessee or the ROW holder has reported any pipeline taken out of service to the Regional Supervisor.
2. Verify that written confirmation is provided if the period of time the pipeline is out of service is greater than 60 days.

IF NONCOMPLIANCE EXISTS:

Issue one warning (W) INC for a pipeline audit if written confirmation is not provided when the period of time that the pipeline is out of service is greater than 60 days.

L-822

HAS THE LESSEE OR THE ROW HOLDER REPORTED ANY PIPELINE SAFETY EQUIPMENT TAKEN OUT OF SERVICE FOR MORE THAN 12 HOURS TO THE REGIONAL SUPERVISOR?

**Authority: 30 CFR 250.1000(e)(1)
30 CFR 250.1008(d)**

Enforcement Action: W/C

INSPECTION PROCEDURE:

Verify that the lessee or the ROW holder has reported any pipeline safety equipment taken out of service for more than 12 hours to the Regional Supervisor.

IF NONCOMPLIANCE EXISTS:

Issue one warning (W) INC if any pipeline safety equipment was taken out of service for a period of more than 12 hours and not reported to the Regional Supervisor.

Issue one component shut-in (C) INC for a pipeline audit if the Regional Supervisor cannot determine that continued activity without pipeline safety equipment would not threaten or result in serious, irreparable, or immediate harm or damage to life (including fish and other aquatic life), property, mineral deposits, or the marine, coastal, or human environment.

Note: The pipeline is the component.

L-823 **HAS THE REGIONAL SUPERVISOR BEEN NOTIFIED WHEN THE PIPELINE SAFETY EQUIPMENT IS RETURNED TO SERVICE?**
Authority: 30 CFR 250.1008(d) **Enforcement Action: W**
INSPECTION PROCEDURE:
Verify that the lessee or the ROW holder has reported to the Regional Supervisor when pipeline safety equipment is returned to service.
IF NONCOMPLIANCE EXISTS:
Issue one warning (**W**) INC for failure to notify the Regional Supervisor when pipeline safety equipment is returned to service.

REPAIR
(Last update - January 2004)

L-831 **HAS THE LESSEE OR THE ROW HOLDER NOTIFIED THE REGIONAL SUPERVISOR PRIOR TO THE REPAIR OF A PIPELINE OR AS SOON AS PRACTICABLE THEREAFTER?**
Authority: 30 CFR 250.1008(e) **Enforcement Action: W**
INSPECTION PROCEDURE:
Verify that the lessee or the ROW holder has notified the Regional Supervisor prior to the repair of a pipeline or as soon as practicable thereafter.
IF NONCOMPLIANCE EXISTS:
Issue one warning (**W**) INC for a pipeline repair if the Regional Supervisor was not notified prior to the repair of a pipeline or as soon as practicable thereafter.

L-832 **HAS A DETAILED REPORT ON THE REPAIR OF A PIPELINE OR PIPELINE COMPONENT BEEN SUBMITTED TO THE REGIONAL SUPERVISOR WITHIN 30 DAYS AFTER COMPLETION OF REPAIRS?**
Authority: 30 CFR 250.1000(e)(1) **Enforcement Action: W/C**
30 CFR 250.1008(e)
INSPECTION PROCEDURE:
1. Verify that a detailed report on the repair of a pipeline or pipeline component was submitted to the Regional Supervisor within 30 days after completion of the repairs.
2. Verify that the detailed report includes the required information.
IF NONCOMPLIANCE EXISTS:
Issue one warning (**W**) INC for a pipeline or pipeline component repair if a detailed report on the repair does not include:
1. Description of the repairs;
2. Results of pressure test; and
3. Date the pipeline or pipeline component was returned to service.
Issue one component shut-in (**C**) INC for a pipeline or pipeline component repair if:
1. A detailed report on the repair was not submitted to the Regional Supervisor within 30 days after completion of the repairs; or
2. After a review of the report, the Regional Supervisor cannot determine that continued activity would not threaten or result in serious, irreparable, or immediate harm or damage to life (including fish or other aquatic life), property, mineral deposits, or the marine, coastal, or human environment.
Note: The pipeline is the component.

CONSERVATION OF RESOURCES

(Last update - January 2004)

INTERESTS

(Last update - January 2004)

R-801 HAS THE OPERATOR RECEIVED APPROVAL FROM THE REGIONAL SUPERVISOR TO COMMENCE PRODUCTION FROM A WELL COMPLETION THAT IS WITHIN 500 FEET FROM A UNIT OR LEASE LINE FOR WHICH THE UNIT, LEASE, OR ROYALTY INTERESTS ARE NOT THE SAME?

Authority: 30 CFR 250.1101(b)

Enforcement Action: C

INSPECTION PROCEDURE:

Review the official documentation and other records to determine if the producing interval of the well is within 500 feet from a unit or lease line for which the unit, lease, or royalty interests are not the same. If so, determine whether approval was received before production began.

IF NONCOMPLIANCE EXISTS:

Issue one component shut-in (C) INC for a well audit if the operator is producing, without approval, from the well in which the completed interval is closer than 500 feet from a lower royalty lease or unit.

Note: The well is the component.

R-802 HAS THE OPERATOR RECEIVED APPROVAL FROM THE REGIONAL SUPERVISOR BEFORE COMPLETING AN INTERVAL WHICH ENCOMPASSES MULTIPLE RESERVOIRS THAT ARE COMMINGLED WITHIN THE WELLBORE?

Authority: 30 CFR 250.1106(a)

Enforcement Action: W/C

30 CFR 250.1106(b)

INSPECTION PROCEDURE:

Review the official documentation and other records to determine if two or more separate reservoirs have been downhole commingled without prior approval and if any of the commingled reservoirs are competitive.

IF NONCOMPLIANCE EXISTS:

Issue one warning (W) INC for a well audit if the audit shows that the operator completed a well in which the completed interval clearly encompasses multiple reservoirs that are downhole commingled without prior approval.

Issue one component shut-in (C) INC for a well audit if the operator completed a well in which the completed interval clearly encompasses multiple reservoirs that are downhole commingled without prior approval and one or more of the commingled reservoirs are competitive.

Note: The well is the component.

ENHANCED RECOVERY

(Last update - January 2004)

R-811 HAS THE LESSEE RECEIVED APPROVAL FROM THE REGIONAL SUPERVISOR PRIOR TO INITIATING AN ENHANCED OIL AND GAS RECOVERY PROJECT OR OTHER TYPE OF INJECTION PROJECT?

Authority: 30 CFR 250.1107(b)

Enforcement Action: W

INSPECTION PROCEDURE:

Review records to determine if the enhanced oil and gas recovery operations were approved by the Regional Supervisor prior to their initiation.

IF NONCOMPLIANCE EXISTS:

Issue one warning (W) INC for a production audit if the enhanced oil and gas operations were initiated prior to receiving approval of the Regional Supervisor.

R-823

ARE THE WELLS AND RESERVOIRS BEING PRODUCED IN A MANNER THAT MAXIMIZES ULTIMATE RECOVERY WITHOUT ADVERSELY AFFECTING CORRELATIVE RIGHTS?

Authority: 30 CFR 250.1101(a)

Enforcement Action: W/C

INSPECTION PROCEDURE:

Review well and reservoir records to determine if hydrocarbon resources are produced in a manner that will maximize their ultimate recovery without adversely affecting correlative rights.

IF NONCOMPLIANCE EXISTS:

Issue one warning (W) INC for a production audit if the records show that:

1. Harm to ultimately recovery of hydrocarbon resources is minimally impacted by current production operations; or
2. Correlative rights are adversely affected.

Issue a component shut-in (C) INC for a production audit if the records show that:

1. Harm to ultimate recovery of hydrocarbon resources is significantly impacted by current production operations; or
 2. Correlative rights are significantly adversely affected, such as draining an adjacent higher royalty lease or unit.
-

WELL TESTS

(Last update - January 2004)

R-831

HAS THE LESSEE CONDUCTED AT LEAST ONE WELL TEST FOR PRODUCING OIL-WELL OR GAS-WELL COMPLETIONS, DURING A HALF-CALENDAR YEAR?

Authority: 30 CFR 250.1102(b)(3)

Enforcement Action: W

INSPECTION PROCEDURE:

Review records to determine if the lessee has conducted at least one well test for producing oil-well or gas-well completions during a half-calendar year.

IF NONCOMPLIANCE EXISTS:

Issue one warning (W) INC for a production audit if at least one well test was not conducted for the completion during the current half-calendar year.

R-832

HAS THE LESSEE SUBMITTED WELL TEST RESULTS FOR EACH PRODUCING OIL-WELL AND GAS-WELL COMPLETION TO THE REGIONAL SUPERVISOR ON FORM MMS-128, SEMIANNUAL WELL TEST REPORT, WITHIN 45 DAYS AFTER THE TEST WAS CONDUCTED?

Authority: 30 CFR 250.1102(b)(3)

Enforcement Action: W

INSPECTION PROCEDURE:

Review records to determine if the lessee well test data was submitted well test results for each producing oil-well and gas-well completion to the Regional Supervisor within 45 calendar days after the test was conducted.

IF NONCOMPLIANCE EXISTS:

Issue one warning (W) INC for a production audit if well test results for a producing oil-well or gas-well completion has not been submitted to the Regional Supervisor within the required time frame.

PRODUCTION MEASUREMENT AND SITE SECURITY

(Last update - January 2004)

CALIBRATION

(Last update - January 2004)

M-801

IS EACH MECHANICAL DISPLACEMENT PROVER AND TANK PROVER CALIBRATED AT LEAST ONCE EVERY 5 YEARS AND A COPY OF THE CALIBRATION REPORT SUBMITTED TO THE REGIONAL SUPERVISOR?

Authority: 30 CFR 250.1202(f)

Enforcement Action: W

INSPECTION PROCEDURE:

1. Verify that each mechanical displacement prover and tank prover has been calibrated in accordance with API MPMS at least once every 5 years.
2. Verify that each calibration report has been submitted to the Regional Supervisor within 15 days after the calibration.

IF NONCOMPLIANCE EXISTS:

Issue one warning (**W**) INC for the calibration verification of one or more provers if:

1. The calibration did not occur at least once every 5 years.
 2. The calibration report was not submitted to the Regional Supervisor within 15 days after the calibration.
-

M-802

IS EACH OPERATING ROYALTY METER PROVED MONTHLY TO DETERMINE THE METER FACTOR AND IS THE PROVING REPORT SUBMITTED TO THE REGIONAL SUPERVISOR?

Authority: 30 CFR 250.1202(d)(3)

Enforcement Action: W/C

30 CFR 250.1202(d)(4)

30 CFR 250.1202(d)(5)

INSPECTION PROCEDURE:

1. Verify that each royalty meter is proved to determine the meter factor monthly, but not to exceed 42 days, unless another proving schedule has been approved by the Regional Supervisor.
2. Verify that a copy of each royalty meter proving report is submitted to the Regional Supervisor within 15 days after the end of the month.

IF NONCOMPLIANCE EXISTS:

Issue one warning (**W**) INC for a proving audit of one or more royalty meters if the current provings have exceeded the approved proving schedule.

Issue one component shut-in (**C**) INC for a proving audit of a royalty meter if the current proving report was not submitted to the Regional Supervisor within 15 days after the end of the month.

Note: The royalty meter is the component.

M-803

IS THE RUN TICKET FOR EACH ROYALTY METER AND ROYALTY TANK COMPLETE, WAS IT PULLED WHEN REQUIRED, AND WAS IT SUBMITTED TO THE REGIONAL SUPERVISOR?

Authority: 30 CFR 250.1202(c)

Enforcement Action: W/C

INSPECTION PROCEDURE:

1. Review the royalty meter or royalty tank run tickets to verify that they clearly identify all observed data, all correction factors, on/off seal numbers (royalty tanks only), and the net standard volume.
2. Verify that a run ticket was pulled at the beginning of the month and immediately after establishing the monthly meter factor or a malfunction meter factor.
3. Verify that a copy of each run ticket is submitted to the Regional Supervisor within 15 days after the end of the month.

IF NONCOMPLIANCE EXISTS:

Issue one warning (W) INC for a run ticket audit of one or more royalty meter and royalty tank if:

1. The current run ticket does not clearly identify all observed data, all correction factors, on/off seal numbers (royalty tank only), and the net standard volume.
2. The current run ticket was not pulled at the beginning of the month and immediately after establishing the monthly meter factor or a malfunction meter factor.

Issue one component shut-in (C) INC for a run ticket audit of a royalty meter or royalty tank if the current run ticket was not submitted to the Regional Supervisor within 15 days after the end of the month.

Note: The royalty meter or the royalty tank is the component.

LIQUID ROYALTY METER

(Last update - January 2004)

M-821

ARE LIQUID HYDROCARBON ROYALTY METERS TAKEN OUT OF SERVICE, REPAIRED OR REPLACED, AND REPROVEN IF THE DIFFERENCE BETWEEN THE METER FACTOR AND THE PREVIOUS METER FACTOR EXCEEDS 0.0025?

Authority: 30 CFR 250.1202(i)(1)

Enforcement Action: W

INSPECTION PROCEDURE:

1. If a malfunction occurs:
 - A. Ensure that the meter remains out of service until the malfunction is corrected.
 - B. Ensure that the average of the malfunction factor and the previous factor is applied to the production measured through the meter between the date of the previous factor and the date of the malfunction factor.
 - C. Ensure that proving reports indicate that a malfunction occurred and show all appropriate remarks regarding subsequent repairs or adjustments.

Note: If A through C above is accomplished, an INC is not warranted.

2. Check proving reports for previous meter malfunctions.

IF NONCOMPLIANCE EXISTS:

Issue one warning (W) INC for a proving report audit if the proving report indicates that:

1. A previous meter malfunction occurred, the meter was taken out of service, repaired or replaced, and reproved; but information as to production averaging and meter repair or replacement is not available.
 2. If proving reports indicate that a previous meter malfunction occurred and the meter was not taken out of service, repaired or replaced, and reproved.
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GAS ROYALTY METER
(Last update - January 2004)

M-831

ARE GAS VOLUME AND QUALITY STATEMENT DISPOSITIONS ON GAS ROYALTY METERS SUBMITTED TO THE REGIONAL SUPERVISOR WHEN REQUESTED?

Authority: 30 CFR 250.1203(b)(6)

Enforcement Action: W/C

30 CFR 250.1203(b)(7)

30 CFR 250.1203(b)(8)

30 CFR 250.1203(b)(9)

INSPECTION PROCEDURE:

1. Verify that the gas volume and quality statements and additional information were submitted when requested.
2. Verify that the gas volume and quality statements clearly identify all required data.

IF NONCOMPLIANCE EXISTS:

Issue one warning (W) INC for a gas volume audit of one or more gas royalty meters if the gas volume and quality statements and additional information do not clearly identify all required data.

Issue one component shut-in (C) INC for a gas volume audit of a gas royalty meter if the requested gas volume and quality statements and additional information requested by the Regional Supervisor are not submitted within the time frame specified.

Note: The gas royalty meter is the component.

GEOLOGICAL AND GEOPHYSICAL EXPLORATION

(Last update - January 2004)

PERMITS

(Last update - January 2004)

O-801 IS REQUIRED PERMIT APPROVED OR NOTICE OF SCIENTIFIC RESEARCH FILED PRIOR TO CONDUCTING A GEOLOGICAL OR GEOPHYSICAL ACTIVITY?

Authority: 30 CFR 251.1
30 CFR 251.3
30 CFR 251.4
30 CFR 251.5
30 CFR 251.10

Enforcement Action: S

INSPECTION PROCEDURE:

Verify that permit has been issued or a notice filed with MMS prior to commencing a G&G activity.

IF NONCOMPLIANCE EXISTS:

Issue one facility shut-in (S) INC for a G&G activity audit if the activity is conducted without a permit or notice.

Note: The G&G activity is the facility.

O-802 ARE GEOLOGICAL AND GEOPHYSICAL ACTIVITIES BEING CONDUCTED IN ACCORDANCE WITH REGULATIONS AND AN APPROVED PERMIT?

Authority: 30 CFR 251.1
30 CFR 251.3
30 CFR 251.4
30 CFR 251.6
30 CFR 251.7
30 CFR 251.8
30 CFR 251.9
30 CFR 251.10

Enforcement Action: W/S

INSPECTION PROCEDURE:

Verify that G&G activities are being conducted in accordance with regulations and the approved permit.

IF NONCOMPLIANCE EXISTS:

Issue one warning (W) INC for a G&G activity audit if the G&G activity was conducted in violation of regulations and an approved permit.

Issue one facility shut-in (S) INC for a G&G activity audit if the G&G activity currently being performed is being conducted in violation of regulation and an approved permit.

Note: The G&G activity is the facility.

DATA

(Last update - January 2004)

O-811 ARE REQUIRED GEOLOGICAL AND GEOPHYSICAL DATA AND INFORMATION SUBMITTED TO MMS WITHIN THE TIME FRAME SPECIFIED BY REGULATION AND PERMIT?

Authority: 30 CFR 251.1
30 CFR 251.10
30 CFR 251.11
30 CFR 251.12

Enforcement Action: W

INSPECTION PROCEDURE:

Verify that required data and information are submitted in the timeframe required by regulations and a G&G permit.

IF NONCOMPLIANCE EXISTS:

Issue one warning (W) INC for a G&G activity audit if the G&G data and information has not been submitted as specified by regulation and permit.
